

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

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GREGORIO TREVINO, JR., et al.)
Plaintiffs,)
)
v.) Civil Case No. 15-CV-435
)
)
HIDALGO COUNTY, TEXAS, et al.,)
Defendants.)
)

Plaintiff's Witness List

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs file this list of trial witnesses in accordance with the pre-trial requirements of this Court. If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.

Plaintiffs' Trial Witnesses

Witness	Description
J.C. Cardenas <i>Plaintiff, c/o</i> Jerad Najvar Najvar Law Firm PLLC 2180 North Loop West, Ste. 255 Houston, TX 77018 Office: (281) 404-4696 Cell: (281) 684-1227 jerad@najvarlaw.com <i>Attorney in Charge for Plaintiffs</i>	Facts and circumstances regarding his claims in this case, and knowledge relevant to the claims of other Plaintiffs' claims.
Rene Martinez Herrera <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, and knowledge relevant to other Plaintiffs' claims.
Santiago Zavala <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, and knowledge relevant to other Plaintiffs' claims.
Gregorio Trevino, Jr. <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding politics in Hidalgo County generally; candidates and slates preferred by Defendants; retaliation against Plaintiffs and preferences for employees following Cuellar's political preferences
Jose Guadalupe Garcia <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, retaliation at Precinct One, and knowledge relevant to other Plaintiffs' claims.
Pedro Garcia, Jr. <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, and knowledge relevant to other Plaintiffs' claims.
George "Doc" Enriquez <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, and knowledge relevant to other Plaintiffs' claims.
Lucas O'Brien Ruiz <i>Plaintiff</i> c/o Jerad Najvar (contact above)	Facts and circumstances regarding his claims in this case, and knowledge relevant to other Plaintiffs' claims.
A.C. Cuellar <i>Defendant</i> Rex N. Leach	Facts and circumstances regarding his actions and actions of other Defendants as relevant to

<p>Atlas, Hall & Rodriguez, LLP P.O. Drawer 3725 (78502) 818 West Pecan Blvd. McAllen, TX 78501 (956) 682-5501 (956) 686-6109 – Facsimile rleach@atlashall.com <i>Attorney in Charge for Defendants</i></p>	<p>Plaintiffs' claims; policies and practices in Hidalgo County and Precinct One.</p>
<p>Raul Lozano <i>Defendant</i> c/o Rex Leach (contact above)</p>	<p>Facts and circumstances regarding his actions and actions of other Defendants as relevant to Plaintiffs' claims; policies and practices in Hidalgo County and Precinct One.</p>
<p>David Rodriguez <i>Defendant</i> c/o Rex Leach (contact above)</p>	<p>Facts and circumstances regarding his actions and actions of other Defendants as relevant to Plaintiffs' claims; policies and practices in Hidalgo County and Precinct One.</p>
<p>Oscar Gonzalez <i>Defendant</i> c/o Rex Leach (contact above)</p>	<p>Facts and circumstances regarding his actions and actions of other Defendants as relevant to Plaintiffs' claims; policies and practices in Hidalgo County and Precinct One.</p>
<p>Esteban Mata <i>Defendant</i> c/o Rex Leach (contact above)</p>	<p>Facts and circumstances regarding his actions and actions of other Defendants as relevant to Plaintiffs' claims; policies and practices in Hidalgo County and Precinct One.</p>
<p>Ofelia Rodriguez c/o Rex Leach (contact above)</p>	<p>Hidalgo County H.R. Director. Knowledge regarding employment and personnel files of Plaintiffs and other employees; policies and practices of Cuellar and Precinct One</p>
<p>Father Francisco Solis St. Joan of Arc Catholic Church 109 S. Illinois Ave. Weslaco, TX 78596</p>	<p>Knowledge regarding effect of retaliation on J.C. Cardenas.</p>
<p>Paul Cazares</p>	<p>Precinct One employee. Knowledge regarding circumstances of retaliation against J.C. Cardenas and retaliation more generally</p>

Plaintiffs also reserve the right to cross-examine all witnesses called by any parties hereto.

Respectfully submitted,

/s/ Jerad Najvar

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Certificate of Service

The undersigned counsel hereby certifies that on April 30, 2019, the foregoing document, and any accompanying exhibits and proposed order, was served on the Defendants in this matter by means of the court's CM/ECF system.

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Counsel for Defendants

/s/ Jerad Najvar

Jerad Najvar